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8 California corporation

9 UNITED STATES DISTRICT COURT
10 SOUTHERN DISTRICT OF CALIFORNIA

11 TARGETSAFETY.COM, INC., a California
12 corporation

13 Plaintiff,

14 v.

15 CONTINUING EDUCATION COORDINATING
16 BOARD FOR EMERGENCY MEDICAL
17 SERVICES, INC., a Missouri non-profit corporation
18 and DOES 1-10

19 Defendants.

Case No.: 08-CV-0994-JLS-JMA

JOINT MOTION AND STIPULATION
REGARDING TARGETSAFETY'S
MOTION FOR PRELIMINARY
INJUNCTION AND APPLICATION FOR
TEMPORARY RESTRAINING ORDER
AND [PROPOSED] ORDER THEREON

20 The parties to this Stipulation are Plaintiff TARGETSAFETY.COM, INC.
21 ("TargetSafety") and Defendant CONTINUING EDUCATION COORDINATING BOARD
22 FOR EMERGENCY MEDICAL SERVICES ("CECBEMS").

23 TargetSafety is represented by Frank L. Tobin of Procopio, Cory, Hargreaves & Savitch
24 LLP.

CECBEMS is represented by Bradley M. Pinsky of Scicchitano & Pinsky, PLLC.

RECITALS

25 A. On or about June 4, 2008, TargetSafety filed a Complaint against CECBEMS in
26 the United States District Court, Southern District of California, Case No. 08-CV-0994-JLS-

1 JMA, for declaratory relief, breach of contract, specific performance and injunction.

2 B. Also on or about June 4, 2008, TargetSafety filed a Motion for Preliminary
3 Injunction and an Application for Temporary Restraining Order in the above-referenced Court to
4 maintain the status quo and enjoin CECBEMS from revoking accreditation of TargetSafety's
5 courses until this matter is adjudicated.

6 C. TargetSafety has requested from the Court a Temporary Restraining Order and
7 Order to Show Cause regarding Preliminary Injunction.

8 D. TargetSafety seeks to preserve the status quo and enjoin CECBEMS from
9 revoking its accreditation of TargetSafety's courses until TargetSafety's Complaint in the above-
10 referenced matter is adjudicated.

11 E. CECBEMS has not filed a responsive pleading to TargetSafety's Complaint and
12 has not filed an Opposition to TargetSafety's Motion for Preliminary Injunction and Application
13 for Temporary Restraining Order.

14 **TERMS OF STIPULATION**

15 1. The terms of the Stipulation incorporate the above Recitals as though set forth in
16 full herein.

17 2. CECBEMS agrees to accept service of TargetSafety's Motion for Preliminary
18 Injunction and Application for Temporary Restraining Order through its counsel Scicchitano &
19 Pinsky, PLLC.

20 3. CECBEMS agrees to maintain the status quo and not revoke the accreditation of
21 TargetSafety's courses while TargetSafety's Motion for Preliminary Injunction and Application
22 for Temporary Restraining Order is pending.

23 4. CECBEMS agrees to recognize TargetSafety's Motion for Preliminary Injunction
24 and Application for Temporary Restraining Order as a Motion for Preliminary Injunction (the
25 "Motion").

26 5. TargetSafety agrees to extend the time for CECBEMS to respond to the Motion to
June 20, 2008.

6. CECBEMS agrees that TargetSafety will have five (5) court days following service of CECBEMS' response to the Motion to file a Reply Memorandum of Points and Authorities pursuant to the Local Rules for the Southern District of California, Rule 7.1(e)(3).

SO STIPULATED AND AGREED.

DATED: June 9, 2008

PROCOPIO, CORY, HARGREAVES &
SAVITCH LLP

By: /s/ Frank L. Tobin
Frank L. Tobin
Attorneys for Plaintiff
TARGETSAFETY.COM, INC., a California
corporation

DATED: June 9, 2008

SCICCHITANO & PINSKY, PLLC

By: /s/ Bradley M. Pinsky
Bradley M. Pinsky
Attorneys for Defendant
CECBEMS

ORDER

WITH GOOD CAUSE HAVING BEEN SHOWN, it is hereby ordered that Plaintiff TargetSafety's Stipulation Regarding Targetsafety's Motion for Preliminary Injunction and Application for Temporary Restraining Order, is hereby GRANTED.

IT IS SO ORDERED.

DATED: _____

HONORABLE JANIS L. SAMMARTINO
U.S. DISTRICT JUDGE